



November 1, 2021

Mayor Bailey and Council  
City of Coronado  
1825 Strand Way,  
Coronado, CA 92118

**Re: Climate Action Campaign recommendations for Coronado's Climate Action Plan**

Honorable Mayor Bailey and City Councilmembers,

Climate Action Campaign (CAC) is a San Diego and Orange County based nonprofit organization with a simple mission: stop the climate crisis through effective policy action.

We have played an active role in the development of every Climate Action Plan (CAP) in the region since 2015, and we release an annual [Report Card](#) evaluating the strength of cities' CAPs and their implementation.

Coronado is one of only three cities in the San Diego region that does have an adopted CAP. Coronado's CAP is an opportunity to develop a comprehensive climate strategy and implementation plan that meets the scale of the challenge the climate crisis poses and helps bring clean air, safe streets, affordable clean energy, and economic benefits to families and businesses in Coronado.

This letter summarizes our initial recommendations for the Coronado CAP update:

***Commit to Zero Carbon by 2045 or Sooner in Line With State Targets:***

As a long-range planning document, we recommend that Coronado's CAP planning horizon extend until at least 2045 aligned with Executive Order B-55-18 to achieve carbon neutrality by 2045. It is imperative that Coronado take bold action to plan for and fully execute a total transition away from fossil fuels now by establishing a roadmap for deep decarbonization.

Also note that Governor Newsom recently directed the California Public Utilities Commission (CPUC), California Air Resources Board (CARB), and other state agencies and officials to accelerate plans to reach carbon neutrality by 2035, **making the 2045 deadline the furthest**

**possible date** for communities to achieve zero carbon and protect themselves from the worst impacts of the climate emergency.

### ***Set a 100 Percent Clean Energy Goal, Commit to Community Choice Energy***

The second largest source of emissions in Coronado is from energy. Therefore, it offers one of the greatest potential and opportunities for GHG emission reductions within the City. To reduce emissions from energy, cities have adopted 100 percent clean energy targets by 2030 or 2035 as part of their CAPs. We recommend Coronado join its peers in adopting a 100 percent clean energy target by 2030 or 2035.

Currently, Energy-4: Increased Renewable Energy Portfolio reads “An option could be to join an existing Community Choice Aggregation (CCA) program”. We recommend Coronado commit to joining an existing CCA program which is the easiest way for any community to meet its 100 percent clean energy target. Countless cities across the region have already done just that, and Coronado should be no exception.

### ***Eliminate Building Emissions by 2045 Through Building Electrification***

Methane gas remains the third largest source of emissions in our communities, and is a widely recognized dangerous indoor air pollutant. To fully transition away from fossil fuels and protect the health of Coronado residents, the City must identify strategies to reduce and eliminate methane gas from residential homes and businesses.

These measures may include all-electric reach codes and ordinances, solarizing public buildings, requiring solar installation for new home construction and major home remodels, encouraging and incentivizing individuals and businesses to add solar capacity to their homes and buildings, municipal building retrofits, and other opportunities to remove this dangerous fossil fuel infrastructure from Coronado communities.

Building electrification measures are also public health measures, as methane gas has been proven to be a dangerous indoor air pollutant, akin to second hand smoke for children with asthma and other cardiovascular disorders.<sup>1</sup>

50 cities in California are already transitioning from gas to all electric buildings, with San José, Santa Monica, Carlsbad, Encinitas, Windsor, San Luis Obispo, San Mateo, and Menlo Park passing building electrification ordinances. We recommend the City adopt more robust CAP measures and City ordinances, to require that all new construction or renovated municipal buildings be 100 percent all electric.

### ***Create a Chief Resilience Officer Position and Commit to Annual Monitoring Reports***

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<sup>1</sup> “Kicking the Gas Habit: How Gas is Harming Our Health,” Climate Council, 2021.  
<https://www.climatecouncil.org.au/resources/gas-habit-how-gas-harming-health/>

In order to ensure timely and transparent progress, we recommend that the City create a Chief Resilience Officer position, with existing staff capacity, to oversee Coronado's CAP implementation, climate and sustainability initiatives, provide holistic risk mitigation for climate change causing issues such as sea level rise, and enhance overall natural disaster preparedness.

The Chief Resilience Officer should develop those strategies and initiatives in consultation with key stakeholders and residents and make necessary updates based on the results and community feedback to create transparency with the public.

### ***Commit to Increasing Solarization and the Usage of Electric Vehicles***

Currently, the *On-Road 1a: Electric Vehicle Charging and Increased Usage of Electric Vehicles* measure description reads "this measure accounts for the emission reductions from increasing the number of electric vehicle (EV) charging stations and the resulting increase in the percentage of total vehicle miles traveled (VMT) driven by EVs."

We recommend the City develop electric vehicle (EV) infrastructure in line with consumer supply and mandated California car sales goal of 100 percent electric by 2035. We also recommend the City to implement programs that encourage new residential and commercial developments to install charging stations onsite. The City should work with businesses to install charging stations in commercial retail parking lots and provide incentives for residents to install charging stations at home.

### ***Adopt More Robust Carbon Sequestration Measures and Green Infrastructure Strategies***

The CAP should include robust green infrastructure strategies to sequester carbon and deliver environmental, social, and economic benefits to residents, as well as work to boost tree canopy coverage in communities of concern first as a key equity strategy.

The City should adopt a measure to develop a holistic green infrastructure plan. A Green Infrastructure Plan can include strategies that preserve or restore natural lands, and implement green streets using techniques such as street trees, permeable pavements, bioretention, swales, and retrofit policies for public and private properties that promote projects such as green roofs.

We recommend quantifying targets associated with each of these strategies, including a tree canopy coverage target. The City of San Diego commits to 35 percent urban tree canopy cover by 2035. We applaud Mayor Bailey's leadership on the goal of planting 1,0001 trees by 2024 and enough new trees to sequester all carbon emissions from Coronado residents car trips that originate and terminate within the city limits by 2030. We recommend Coronado continue to explore this initiative and other policy opportunities.

### ***Commit to Zero Waste***

Currently, the Waste-1: Increased Waste Diversion measure description reads “This measure would include exceeding the waste diversion goal (75 percent) required by AB 341 by adopting Citywide waste goals to divert all organic waste by 2045. The City will have responsibility to expand or establish composting, recycling, and yard waste programs to residences and businesses. The City would work with waste providers to ensure the goal of 100 percent reduction of organic waste was achievable by 2045.”

Coronado’s EDCO residential and commercial organic waste solutions are not enough for the City to achieve a zero waste goal. We recommend adopting a Zero Waste policy that sets a goal for 90-100 percent waste diversion citywide by 2030. The CAP can achieve zero waste through strategies such as developing a plastic reduction ordinance, eliminating single-use materials, composting, and capturing landfill gas.

***Adopt a CEQA Qualified, Legally Binding Plan:***

Adopting a legally binding CAP will convey to Coronado residents that the City is doing everything in its power to protect and preserve the future of the Coronado community.

Coronado currently has an aspirational CAP composed of no actionable and strategic goals or targets tailored to the City’s local context. For a CAP to function meaningfully as a roadmap to its reduction target, the measures in the plan must be enforceable—specific, unambiguous, and contain clear requirements.

CAPs throughout the region have shifted to favor bold, legally binding plans to mitigate the climate crisis. Currently, eight cities in San Diego County have legally binding CAPs: the City of San Diego, San Marcos, Carlsbad, National City, La Mesa, Vista, Encinitas, and Escondido.

We urge the City to make the updated CAP legally binding and ensure all CAP measures are enforceable and legally defensible.

***Set Overall Mode Share Targets for Biking, Walking, and Transit, and Complementary Measures and Strategies***

The largest source of emissions in Coronado is from On-Road Transportation accounting for 43 percent of emissions. In order to reduce vehicle miles traveled (VMT) and associated greenhouse gas (GHG) emissions, the CAP must commit to specific mode share targets for biking, walking and transit.

The implementation of the CAP’s current Active Transportation Plan (ATP) measure would increase an existing bikeway network by 2.8 miles and an existing pedestrian sidewalk infrastructure by 2 miles. We recommend that the CAP set higher overall mode share targets for biking, walking, and transit tailored to the City’s local context and include strategies to meet them.

Currently, the On-Road 6a: Improve Bike Infrastructure measure description reads “A bikeway network includes an interconnected system of bike lanes, bike paths, and cycle tracks (Class I, Class II, and Class IV facilities). Bike facilities may share the roadway with vehicles or provide a dedicated pathway that separates bikes from cars or pedestrians. Increasing the network of bike facilities help to encourage biking as a safe and convenient alternative to driving.” However, Class II bike facilities, which are striped bike lanes without a physical barrier, do not increase ridership as much as physically protected bike lanes. Research shows that better safety outcomes for all road users, especially bicyclists, are associated with a greater prevalence of bike facilities—particularly protected and separated bike facilities—and that high-bicycling-mode-share cities are safer for all road users.<sup>2</sup>

To increase bike ridership and secure safer streets for all, we recommend prioritizing protected and/or separated bike infrastructure, not painted bike lanes. That means only installing Class I or Class IV bike facilities. We also recommend creating bike racks and tire repair stations near existing and future bike infrastructure.

The City should direct the Mobility Commission to assist staff in developing a complete streets policy and smart growth strategies, optimize transit options in partnership with SANDAG and the Navy because approximately 30,000 daily commuters drive through Coronado to the base, and commit to other efforts to create bikeable, walkable neighborhoods.

### ***Include Smart Land Use Policies with Affordable Housing Near Transit***

The CAP currently does not include strategies that advance the development of affordable housing, especially near the City’s transit priority areas (TPAs). Building affordable housing near transit is a key equity strategy to reduce VMT and GHG emissions, and create inclusive and sustainable communities. We recommend that the CAP include the following measures to increase the supply of affordable housing near transit:

- Pursue State grants such as the Affordable Housing and Sustainable Communities grants to support affordable housing projects near transit;
- Further explore infill opportunities to utilize existing properties adjacent to transit and job centers to develop affordable housing for very low-income and low-income families; and
- Develop a robust inclusionary housing ordinance to boost affordable housing production and support inclusive communities.

### ***Center and Strengthen Equity by Developing a Climate Equity Index***

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<sup>2</sup> Wesley E. Marshall, Nicholas N. Ferenchak, “Why cities with high bicycling rates are safer for all road users,” *Journal of Transport & Health*, Volume 13, 2019, <https://www.sciencedirect.com/science/article/abs/pii/S2214140518301488?via%3Dihub>

There is no mention of equity in this CAP. Climate change hits hardest in communities of concern that are disproportionately burdened by multiple sources of pollution and face health and socioeconomic challenges. California's Environmental Health Screening Tool, CalEnviroScreen 3.0, identifies communities most vulnerable to pollution and climate impacts so that state and local governments can direct attention and resources toward the pursuit of economic, environmental, and racial justice in those places.

We make the following recommendations of how Coronado can center equity in the CAP:

- Create a Climate Equity Index (CEI) within the CAP that explicitly defines which, if any communities in Coronado are most vulnerable and impacted by the climate crisis, and prioritizes said communities to ensure those most impacted by climate change and environmental pollution are prioritized in the implementation of GHG reduction strategies (i.e. investments in urban forestry, active transportation, renewable energy, and energy efficiency measures, etc.);
- Ensure that the development and implementation of the CEI takes place in consultation with a diverse set of stakeholders from the identified most impacted communities; and
- Work with key stakeholders and utilize CalEnviroScreen and other indicators to incorporate equity considerations into implementation of the CAP. The City should actively prioritize actions and measures that include consideration of social equity. In preparing a holistic approach to equity, the City should develop tracking and reporting metrics to determine progress and success, and make necessary updates based on the results and community feedback.

### **Conclusion**

Thank you for the opportunity to weigh in on the development of this critically important document. Coronado's CAP presents an opportunity to help protect the health and safety of current and future generations from the worst impacts of climate change. We urge you to direct staff to incorporate the recommendations above to comply with legal requirements, maximize emissions reductions, and deliver economic, safety, and health benefits to families and businesses.

Sincerely,

Madison Coleman  
Policy Advocate  
Climate Action Campaign

*Madison Coleman*